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5 Attorneys for Plaintiff, MARCIA GREENER

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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

10
11 MARCIA GREENER,

12 Plaintiff,

13 v.

14 MGM RESORTS INTERNATIONAL,
15 INC. and DOES 1-10, inclusive

16 Defendants.

Case No. '16CV1929 CAB KSC

**COMPLAINT FOR
NEGLIGENCE, JURY
DEMAND**

(28 U.S.C. § 1332; Diversity of
Citizenship)

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18 Plaintiff, MARCIA GREENER, alleges and states as follows:

19 1. Plaintiff, MARCIA GREENER, is, and at all times herein mentioned, was
20 a resident of the County of San Diego, State of California.

21 2. Defendant, MGM RESORTS INTERNATIONAL, INC., is, and was all
22 times herein mentioned, a Delaware Corporation doing business in the City of Las Vegas,
23 County of Clark, and State of Nevada, including, but not limited to the subject premises,
24 The Bellagio Hotel & Casino, located at 3600 South Las Vegas Blvd in Las Vegas,
25 Nevada, where the subject incident occurred.

26 3. Defendants, and each of them, breached their duty to Plaintiff, in failing to
27 act reasonably, and with due care, in keeping, maintaining, operating and controlling the
28 subject premises in a reasonable and safe condition, which would not create a serious

1 danger to persons on the premises, including Plaintiff.

2 3. As a proximate result of the negligence and carelessness of Defendants, and
3 each of them, and the resulting accident as above alleged, Plaintiff was injured in her
4 health, strength and activity, sustaining severe injury to her body, all of which have
5 caused and continue to cause her mental and physical pain and suffering. Plaintiff is
6 informed and believes, and on that basis alleges, that the injuries will result in some
7 permanent disability to Plaintiff, all to her total damages in excess of \$75,000, in specific
8 amounts to be shown according to proof.

9 4. As a further proximate result of the negligence and carelessness of
10 Defendants, and each of them, Plaintiff was required to employ, and continues to employ,
11 physicians to examine, treat and care for her, and did and continues to incur medical and
12 incidental expenses to be shown according to proof.

13 5. As a further proximate result of the negligence and carelessness of
14 Defendants, and each of them, Plaintiff was prevented from attending to employment
15 thereby incurring loss of earning capacity all to her further damages.

16 WHEREFORE, Plaintiff prays for judgment as follows:

- 17 1. For general damages according to proof;
18 2. For special damages for medical and incidental expenses according to proof;
19 3. For costs of suit herein incurred;
20 4. For pre-judgment interest as provided by law; and
21 5. For such other and further relief as the court may deem proper.

22 Dated: July 29, 2016

LIEBMAN, QUIGLEY & SHEPPARD
A Professional Law Corporation

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24 By: 

JOHN G. MADSEN, ESQ.
Attorneys for Defendant
MARCIA GREENER